

Suggestions for Organizing Public Comment on the Preliminary OP Cumulative Risk Assessment

On December 28, 2001 a Federal Register notice was published which announced the availability of the preliminary cumulative risk assessment for the organophosphorous pesticides. The notice stated that by allowing access and opportunity for comment on the preliminary risk assessment, EPA is seeking to strengthen stakeholder involvement and help ensure our decisions under FQPA are transparent and based on the best available information. Comments, identified by docket control number OPP-34250, must be received on or before March 8, 2002.

The complex preliminary OP cumulative risk assessment involves numerous chemicals, large data sets, many new methods, and potentially affects a large number of registrants, growers, and other stakeholders. Because of this complexity the Agency discussed, at the January 16, 2002 CARAT workgroup meeting, ways to work with stakeholders to develop an efficient process for stakeholder comment. The goals were to ensure efficiency of the comment process, clarity of comments, conciseness of comments, and well organized comments. As the result of that discussion the Agency is providing the following suggestions on organizing public comment on the preliminary OP cumulative risk assessment.

What follows are *suggestions*. There is no requirement that these suggestions be followed nor are you required to provide personal identification information in your comment (as suggested on the attached cover sheet). EPA will consider all of the comments that are submitted regardless of whether they follow these suggestions or include the commenter's identification information. Identification information is helpful, should there be a need to seek clarification on the comment submitted. These suggestions do not replace or supercede any information provided in the Federal Register Notice announcing the public comment period on the preliminary risk assessment.

I. General Suggestions

- ★ All comments should be submitted to the Agency through the public docket.
- ★ All comments should be as clear and concise as possible.
- ★ For literature citations, please provide a complete and correct citation. It would be most useful if a copy of the cited document could be provided.
- ★ It would be most useful to provide both a paper copy and an electronic copy of all comments.
- ★ Do not knowingly submit duplicate comments (if commenters feel this is necessary, please list other commenters that are submitting essentially the same comments).

II. Suggestions on Format

- ★ The general format of the comments should follow that of the risk assessment:
 - ▶ Hazard
 - ▶ Food
 - ▶ Residential
 - ▶ Water
 - ▶ Cumulative Assessment/Risk Characterization
 - ▶ Regional Assessments
- ★ Use the attached cover sheet either as a cover to your entire submission or as a cover for each individual section listed above.
- ★ Make it clear on the cover sheet if your comment contains data proposed for inclusion in the risk assessment.
- ★ Provide summaries or abstracts of comments.
- ★ Provide a detailed outline of comments or table of contents.
- ★ Keep individual sections (e.g. related to hazard, food, residential, water, etc.) separate for ease of transference to relevant reviewers.

Suggested Cover Sheet for Written Comments

Docket Control #: OPP-34250

Date:

Submitter Name:

Organization(s) Represented (if any):

Does this comment contain:

☐ Data
Briefly Describe:

☐ Literature Citations
Briefly Describe:

Is the Citation(s) Attached?

- ☐ Yes
☐ No

Does this comment contain information that is:

- ☐ New
☐ Previously submitted
☐ A combination of new and previously submitted

Does this comment relate to:

- ☐ All chemicals
☐ Specific Chemicals; Please Specify Which Chemical(s):

Does this comment relate to:

- ☐ Entire Analysis
☐ Hazard Assessment
☐ Food Assessment
☐ Food Processing Factors
☐ Residential Assessment
☐ Water Assessment
☐ Cumulative Assessment/Risk Characterization
☐ Regional Assessments
☐ Other, Please Specify:

Are you aware of other comments that are being submitted which are similar or identical in content to these comments?

- ☐ No

Yes, Please list other submitters: